

EXHIBIT A



**Service of Process
Transmittal**

10/17/2016

CT Log Number 530020455

TO: Jill M Calafiore, Rm 3A119A
AT&T Corp.
One AT&T Way-
Bedminster, NJ 07921-

RE: Process Served in Tennessee

FOR: DIRECTV, LLC (Domestic State: CA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	Glenn Edmonds, Pltf. vs. DirecTV, LLC, Dft.
DOCUMENT(S) SERVED:	Notice, Proof of Service, Complaint
COURT/AGENCY:	Hardeman County Circuit Court, TN Case # 2016CV42
NATURE OF ACTION:	Plaintiff seeking damages against defendant for violation of Telephone Consumer Protection Act
ON WHOM PROCESS WAS SERVED:	C T Corporation System, Knoxville, TN
DATE AND HOUR OF SERVICE:	By Certified Mail on 10/17/2016 postmarked on 10/12/2016
JURISDICTION SERVED :	Tennessee
APPEARANCE OR ANSWER DUE:	Within 30 days, exclusive of the date of service
ATTORNEY(S) / SENDER(S):	Van D. McMahan McMahan Law Firm 109 W. Court Avenue Selmer, TN 38375 731-645-3100
ACTION ITEMS:	CT has retained the current log, Retain Date: 10/17/2016, Expected Purge Date: 10/22/2016 Image SOP Email Notification, Jill M Calafiore jcalafiore@att.com
SIGNED:	C T Corporation System
ADDRESS:	800 S. Gay Street Suite 2021 Knoxville, TN 37929-9710
TELEPHONE:	216-802-2121

Page 1 of 1 / VP

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

7013 1710 0001 0251 2836

CERTIFIED MAIL™

OF THE RETURN ADDRESS FOLD AT DOTTED LINE

McMAHAN LAW FIRM
Van D. McMahan
Attorney At Law
109 West Court Avenue
Selmer, TN 38375

U.S. POSTAGE
PAID
SELMER, TN
38375
OCT 12, 2016
AMOUNT
\$6.47
R2305M145719-03

1000 37929

**RETURN RECEIPT
REQUESTED**

DIRECTV, LLC.
c/o CT Corporation System
800 South Gay Street
Ste. 2021
Knoxville, TN 37929-9710

**RETURN RECEIPT
REQUESTED**

379299710 0002

CIRCUIT COURT
FILED

OCT 05 2016

COPY



AT 11:09 AM IN THE CIRCUIT COURT OF HARDEMAN COUNTY, TENNESSEE
BY LINDA K FULGHUM, CLERK
PG
HARDEMAN COUNTY, TN
GLENN EDMONDS,

Plaintiff

Vs.

DIRECTV, LLC.,

Defendant.

2016-CV-42

TO BE SERVED BY
CERTIFIED MAIL

To the Named Defendant(s):
DIRECTV, LLC.,
c/o CT Corporation System
800 South Gay Street
Ste. 2021
Knoxville, TN 37929-9710

NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT
AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are hereby summoned and required to mail or hand deliver a copy of a written response to the Complaint to Plaintiff's attorney, Van D. McMahan, 109 West Court Ave., Selmer, Tennessee 38375, which is herewith served upon you, **WITHIN THIRTY (30) DAYS, EXCLUSIVE OF THE DAY OF SERVICE, AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.** You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

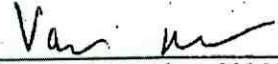
Oct Issued under my hand and the seal of said court, this *6* day of
2016.

Linda K Fulghum, PD
Clerk of Court

PROOF OF SERVICE-SUMMONS

I hereby certify that on the 12th day of October, 2016, I mailed per certified mail this summons together with a copy of the complaint herein as follows:

BY CERTIFIED MAIL AND ACKNOWLEDGEMENT SERVICE. By mailing (certified mail with return receipt) on the date stated in the attached Notice, copies to the person to be served, together with copies of the form of notice and acknowledgement.


Van D. McMahan 022385
Attorney for the Plaintiff
109 West Court Avenue
Selmer, TN 38375

THIS SUMMONS IS ISSUED PURSUANT TO RULE 4(c)(3) OF THE MISSISSIPPI
RULES OF CIVIL PROCEDURE

CIRCUIT COURT
FILED

OCT 05 2016



IN THE CIRCUIT COURT OF HARDEMAN COUNTY, TENNESSEE

AT 11:09 AM
BY LINDA K. FULGHUM, CLERK
FOR GLENN EDMONDS, PG

Plaintiff

Vs.

DIRECTV, LLC.,

Defendant.

2016-CV-42

STATE OF TENNESSEE HARDEMAN COUNTY,
I, Linda K. Fulghum, Clerk of the Circuit and General
Sessions Court, certify that the foregoing is a true & correct
copy of the original as appears of record in my office.
Witness my hand and seal this 6 day of Oct
2016 Linda K. Fulghum, P.D.
Circuit & General Sessions Clerk, Hardeman County, TN

COMPLAINT

Comes Now, Glenn Edmonds, Plaintiff ("hereinafter referred to as Plaintiff or Edmonds, and for his Complaint against the Defendant, DirecTV, LLC. ("hereinafter referred to as Defendant or DirecTV"), and states as follows:

PRELIMINARY STATEMENT

1. This case challenges Defendant's policy and practice of making unsolicited phone calls to persons or consumers including Plaintiff in violation of the Telephone Consumer Protection Act (TCPA).

2. The Telephone Consumer Protection Act (TCPA), 47 U.S.C. § 227, (b) prohibits a person or entity within the United States to make any call without the consent of the recipient from an automated telephone dialing system. The TCPA provides a private right of action for violations and provides statutory damages of \$500.00 per violation.

3. 47 U.S.C. § 227 (b) provides in part as follows:

(b) Restrictions on use of automated telephone equipment. (1) Prohibitions. It shall be unlawful for any person within the United States, or any person outside the United States if the recipient is within the United States--

i (A) to make any call (other than a call made for emergency purposes or made with the prior express consent of the called party)

using any automatic telephone dialing system or an artificial or prerecorded voice--

1 (i) to any emergency telephone line (including any "911" line and any emergency line of a hospital, medical physician or service office, health care facility, poison control center, or fire protection or law enforcement agency);

2 (ii) to the telephone line of any guest room or patient room of a hospital, health care facility, elderly home, or similar establishment; or

3 (iii) to any telephone number assigned to a paging service, cellular telephone service, specialized mobile radio service, or other radio common carrier service, or any service for which the called party is charged for the call, unless such call is made solely to collect a debt owed to or guaranteed by the United States;

4. Plaintiff seeks an award of statutory and punitive damages for each violation of the TCPA.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction pursuant to The Supreme Court's decision in Mims v. Arrow Fin. Servs. LLC, 132 S. Ct. 740, 747, 181 L. Ed. 2d 881 (2012), holding that state courts have concurrent jurisdiction with federal courts concerning private causes of action for TCPA claims. See also, Bridging Cmty., Inc. v. Top Flite Fin., Inc., 2013 U.S. Dist. LEXIS 6892.

6. Venue is appropriate because the Defendant transacted business in Hardeman County, Tennessee at all times herein and the Plaintiff has resided in Hardeman County, Tennessee.

PARTIES

7. Plaintiff is resident and citizen of Hardeman County, Tennessee.

8. On information and belief, Defendant DirecTV is a California corporation which has its principal place of business in El Segundo, California, and was at all times herein doing business in Hardeman County, Tennessee.

FACTS

9. Beginning March 8, 2016, and continuing through March 19, 2016, Defendant called Plaintiff's telephone number ten (10) different times by an automated phone system. A copy of the phone calls is attached hereto and marked as Exhibit A.

10. Defendant did not have Plaintiff's prior express invitation or permission to send make such phone calls.

11. There is no reasonable means for Plaintiff to avoid receiving illegal phone calls.

CAUSE OF ACTION

12. TELEPHONE CONSUMER PROTECTION ACT, 47 U.S.C. § 227

13. The TCPA defines "unsolicited advertisement" as "any material advertising the commercial availability or quality of any property, goods, or services which is transmitted to any person without that person's express invitation or permission." 47 U.S.C. § 227(a)(4).

14. The TCPA provides:

3. Private right of action. A person may, if otherwise permitted by the laws or rules of court of a state, bring in an appropriate court of that state:

(A) An action based on a violation of this subsection or the regulations prescribed under this subsection to enjoin such violation,

(B) An action to recover for actual monetary loss from such a violation, or to receive \$500 in damages for each such violation, whichever is greater, or

(C) Both such actions.

15. The TCPA is a strict liability statute, so Defendant is liable to Plaintiff even if its actions were only negligent.

16. Defendant knew or should have known that (a) Plaintiff had not given express invitation or permission for Defendant or anybody else to make automated phone calls about Defendant's goods or services, and (b) that Plaintiff did not have an established business relationship.

17. Defendant's actions caused damages to Plaintiff.

18. Receiving Defendant's unsolicited calls caused an invasion of Plaintiff's privacy.

19. Defendant violated 47 U.S.C. § 227 et seq. by transmitting Exhibit A hereto to Plaintiff without obtaining their prior express permission or invitation.

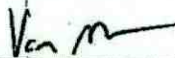
WHEREFORE, Plaintiff, Glenn Edmonds, demands judgment in his favor and against Defendant, DirecTV, as follows:

A. That the court award actual monetary loss from such violations or the sum of \$500.00 in damages for each violation whichever is greater; and

B. The court enjoin Defendant from additional violations; and

C. That the court award costs and such further relief as the court may deem just and proper, including punitive damages, fines, costs, and attorney fees.

Respectfully Submitted,



VAN D. MCMAHAN (BPR #022385)

McMahan Law Firm
Attorneys for Plaintiff
109 W. Court Avenue
Selmer, TN 38375
(731) 645-3100



ROSS MITCHELL (BPR #028231)

McMahan Law Firm
Attorneys for Plaintiff
109 W. Court Avenue
Selmer, TN 38375
(731) 645-3100